



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

May 5, 2010

Mr. James Stull  
Continental Heat Treating  
10643 Norwalk Boulevard  
Santa Fe Springs, CA 90670

Certified Mail  
Return Receipt Requested  
Claim No. 7009 0820 0001 6811 8742

**CALIFORNIA WATER CODE SECTION 13267 ORDER: REQUIREMENTS TO SUBMIT TECHNICAL REPORTS TO INVESTIGATE THE EXTENT OF SOIL MATRIX, SOIL-GAS, AND GROUNDWATER CONTAMINATION – CONTINENTAL HEAT TREATING, 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS (SCP NO. 1057, SITE ID NO. 204GW00)**

Dear Mr. Stull:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7). Enclosed is a Regional Board Order (Order) requiring submittal of technical reports pursuant to CWC section 13267. The Order requires preparation and submittal of technical report(s) for the lateral and vertical delineation of impacted soil, soil-gas, and groundwater on and offsite (if necessary).

Due to soil-gas at the subject site being impacted with high levels of chlorinated volatile organic compounds above the California Human Health Screening Levels (based on sample data from approximately 5 feet to 60 feet below ground surface), and because this contamination extends to the groundwater interface at approximately 65 feet below ground surface, you are being required to investigate and completely delineate the lateral and vertical extent of contamination in soil, soil-gas, and groundwater from releases at the Continental Heat Treating facility.

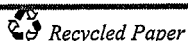
If you have any questions regarding this Order, please feel free to contact me at (213) 576-6733 or via email at [dyoung@waterboards.ca.gov](mailto:dyoung@waterboards.ca.gov).

Sincerely,

David A. Young  
Engineering Geologist  
Site Cleanup Program Unit I

Enclosures: 1. Regional Board 13267 Order dated April 28, 2010  
2. Regional Board letter dated April 16, 2002  
3. Chemical Storage and Use Questionnaire

**California Environmental Protection Agency**



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### REQUIREMENTS TO SUBMIT TECHNICAL REPORTS (CALIFORNIA WATER CODE SECTION 13267)

CONTINENTAL HEAT TREATING  
10643 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA  
(SITE ID NO. 204GW00, SCP NO. 1057)

**You are legally obligated to respond to this Order. Please read this carefully.**

Pursuant to section 13267(b) of the California Water Code (CWC), you are hereby directed to define the extent of soil, soil gas, and groundwater contamination encountered at the subject site (Site) and submit the following:

1. By **August 30, 2010**, you are required to prepare and submit the first work plan under this Order for our review and approval for the lateral and vertical delineation of impacted soil, soil gas, and groundwater on and offsite (if necessary). You may choose to implement the required investigation(s) in a phased approach to allow for evaluation of the most current analytical data. Due to high concentrations of volatile organic compounds (VOCs) contamination detected during previous investigations in soil matrix and soil gas samples at shallow depths beneath the on-Site building, the required work plan must also include a proposal to complete a vapor intrusion evaluation using current Site specific physical and chemical data.

Following approval of the required first work plan, additional soil matrix, soil gas, and groundwater investigation(s) shall be conducted until the lateral and vertical extents of the subsurface contamination originating from the Site are adequately defined. A report or reports documenting the results of, or work plans to conduct the required soil matrix, soil gas, and groundwater investigations shall be submitted by the due date(s) specified in future amendments to this Order and in the work plan approval or report review comment letter(s) from the Los Angeles Regional Water Quality Control Board (Regional Board).

2. By **September 15<sup>th</sup>, 2010**, you are required to submit a groundwater monitoring well installation and sampling report to the Regional Board, following installation of the three proposed groundwater wells at the Site in accordance with the *Work Plan for Well Installation and Monitoring* dated March 4, 2002, prepared by Environmental Support Technologies, Incorporated, and the Regional Board staff approval letter dated April 16, 2002 (attached). Installation of these wells will provide general hydrologic information (such as, depth to groundwater and flow direction) for the Site; however, additional groundwater wells must be proposed in the required first work plan (above) to evaluate and monitor groundwater quality in the areas of identified and potential on-Site sources. Please refer to the Regional Board's *Interim Site Assessment and Cleanup Guidebook, May 1996* (Appendix B), for general guidelines on conducting groundwater investigations. This document can be found online at the following address:

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Mr. James Stull  
Continental Heat Treating

May 5, 2010

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/remediation/may1996\\_voc\\_guidance.shtml](http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/may1996_voc_guidance.shtml).

3. Quarterly groundwater monitoring of the existing and new groundwater monitoring wells must be conducted according to the following schedule, beginning with the submission of the 1<sup>st</sup> quarter 2011 report on April 15<sup>th</sup>, 2011:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January-March	April 15 <sup>th</sup>
April-June	July 15 <sup>th</sup>
July-September	October 15 <sup>th</sup>
October-December	January 15 <sup>th</sup>

4. To update our records, you are required to complete and return the attached chemical use questionnaire to provide information on past and/or present chemical storage and usage at the Site. The enclosed questionnaire is due to the Regional Board by **August 21, 2010**. The return of this questionnaire, properly signed, is required for all chemicals that are/were stored or used at the Site.
5. Effective immediately, in addition to hard copies, all future reports and data must be uploaded via e-submittal to GeoTracker by the report due date specified by the Regional Board. Due to technical constraints, you are also required to submit hard copies of all Site documents, data, and correspondence to the Regional Board by the specified due date(s). Currently, all of the information on electronic submittal regulations and GeoTracker contacts can be found at:

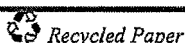
[http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical reports/documents described above, or failure to comply with regulations requiring the electronic submittal of information, which went into effect on January 1, 2005, may result in the imposition of civil liability penalties by the Regional Board, without further warning, of up to \$1,000 per day for each day the report(s) are not received or compliance with the required electronic submittal of information is not met, after the **above** due dates.

The Regional Board needs the required information in order to determine the lateral and vertical impact to soil matrix, soil gas, and groundwater from releases of chlorinated VOCs at the Site. You are being required to submit the required documents based on the following justification:

- File documents indicate that Continental Heat Treating (CHT) has been operating at the Site since 1969. According to a report provided by McLaren Hart Environmental Engineering Corporation (McLaren) dated September 22, 1993, a facility drawing dated August 20, 1968, showed a degreaser located approximately 30 feet south of the northern wall of the current on-Site building. A pipe trench was shown going from the degreaser to the north end of the building and continuing westward along the property line. The McLaren report also indicated that an

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Mr. James Stull  
Continental Heat Treating

May 5, 2010

Inspection report dated April 5, 1982, obtained during a file review at the Santa Fe Springs Fire Department, noted that a degreaser was present in the northeast portion of the on-Site building.

- Hazardous materials registration forms dated February 15, 1993, reported an average tetrachloroethene (PCE) use of 125 gallons per day and a maximum daily use of 250 gallons per day. The same forms reported that 1.5 tons of PCE waste were generated each year from CHT operations.
- From at least 1986 to 1995, an in-ground vapor degreaser was located roughly in the center of the 20,000 square foot on-Site building. PCE was used as the primary degreasing solvent and was stored in a bermed location in the southwest corner of the Site. A clarifier was also used by the facility and was located on the eastern side of the current building.
- Site assessment data indicate that soil matrix, soil gas, and groundwater have been impacted with chlorinated VOCs including PCE, trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride (VC).
- VOCs have been detected in soil gas samples at concentrations up to 41,300 micrograms per liter ( $\mu\text{g/L}$ ) of PCE at 15 feet below ground surface (bgs), 246  $\mu\text{g/L}$  of TCE at 5 feet bgs, 756  $\mu\text{g/L}$  of cis-1,2-DCE at 5 feet bgs, and 211  $\mu\text{g/L}$  of VC at 15 feet bgs.
- Petroleum hydrocarbons were also detected in soil gas samples collected from 5 feet to 60 feet bgs at concentrations ranging from 4,000  $\mu\text{g/L}$  to 12,000  $\mu\text{g/L}$ .
- Soil matrix sampling completed to a depth of 10 feet bgs adjacent to the former in-ground vapor degreaser detected concentrations of PCE and TCE up to 7,514 and 4,759 micrograms per kilogram ( $\mu\text{g/kg}$ ). Subsequent investigations identified chlorinated VOCs down to the depth of groundwater (approximately 65 feet bgs) in soil matrix and soil-gas samples in this same area.
- The Site is located within the US Environmental Protection Agency (USEPA) Omega Superfund Site boundaries. Based on sampling data obtained by the USEPA, groundwater quality in the area of the Site has been impacted by chlorinated VOCs released from multiple sources. Currently, there are no groundwater monitoring wells installed at the Site. Regional Board staff approved a work plan for installation of three on-Site wells in a letter dated April 16, 2002; however, these monitoring wells have not been installed. PCE concentrations of 1,517 and 934  $\mu\text{g/L}$  detected in soil-gas samples collected in the area of the former in-ground vapor degreaser at depths of 45 and 60 feet bgs (approximate depth of the capillary fringe), respectively, suggests that groundwater has been impacted from releases at the Site. Investigation of groundwater is required at this time to define the lateral and vertical extent of contamination caused by releases at the Site.
- According to the Regional Board's records, a soil vapor extraction (SVE) system was operated on-Site in the vicinity of the former in-ground vapor degreaser for approximately 4 months in 2004. The consultant for the Site indicated that operation of the SVE system was discontinued due to the inability of SVE to remove chlorinated VOCs. Therefore, high concentrations of

Mr. James Stull  
Continental Heat Treating

May 5, 2010

chlorinated VOCs likely remain in soil and soil gas beneath the former in-ground vapor degreaser and may act as a source of groundwater contamination.

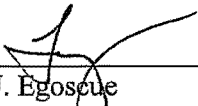
We believe that the burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. If you disagree and have information about the burdens, including costs, of complying with these requirements, provide such information to Mr. David Young within ten days of the date of this letter so that we may reconsider the requirements.

All future technical reports required pursuant to CWC section 13267 Order shall contain the following completed perjury statement (below). The perjury statement shall be signed by you or someone acting on your behalf as a senior authorized representative (and not by a consultant). It shall be in the following format:

"I [Name], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [Job Title] for [Name of Responsible Party/Discharger], that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [Name and Date of Report] is true and correct, and that this declaration was executed at [Place], [State], on [Date]."

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

SO ORDERED.

  
\_\_\_\_\_  
Tracy J. Egoscue  
Executive Officer

May 5, 2010



# California Regional Water Quality Control Board

## Los Angeles Region

Winston H. Hickox  
Secretary for  
Environmental  
Protection

Over 50 Years Serving Coastal Los Angeles and Ventura Counties  
Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>



Gray Davis  
Governor

April 16, 2002

Mr. James Stull  
Continental Heat Treating  
10643 South Norwalk Boulevard  
Santa Fe Springs, CA 90670

### REVIEW OF MONITORING WELL INSTALLATION WORKPLAN – CONTINENTAL HEAT TREATING, 10643 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA (SLIC NO. 1057)

Dear Mr. Stull:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the "Work Plan for Well Installation and Monitoring" prepared by Environmental Support Technologies Inc., (EST) dated March 4, 2002 for the above referenced site. After review of this work plan, the Regional Board approves the work plan with the following conditions:

1. Please collect soil samples at 5-foot intervals from the ground surface to 5-feet below the capillary fringe and analyze each sample for volatile organic compounds (VOCs) by EPA Method 8260B.
2. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to well installation must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to the Regional Board must be signed and/or stamped by a California registered geologist, a California registered certified specialty geologist or a California registered civil engineer.
3. A California licensed land surveyor must survey all proposed groundwater monitoring wells to a benchmark of known elevation above mean sea level. The survey report, signed by the licensee, shall be included in the assessment report.
4. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.
5. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 *Interim Site Assessment & Cleanup Guidebook*, Appendices B and C.
6. All soil samples collected for VOC analysis shall be obtained using EPA Method 5035 sampling procedures.
7. Monitoring well construction and development must comply with California requirements.
8. The appropriate permits must be obtained prior to remedial or assessment work. A list of permits and permitting agencies must be submitted to this Regional Board prior to fieldwork.

### California Environmental Protection Agency

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



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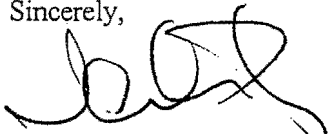
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April 16, 2002

9. Quarterly groundwater monitoring shall be performed as stated in Regional Board letter dated January 24, 2002.
10. Pursuant to a telephone conversation held on February 7, 2002 between Regional Board staff and Rick Fero with Fero Engineering, it was stated that the groundwater wells may be nested with vapor extraction wells in the same boring. Please notify the Regional Board if this is the case, and if the wells are to be nested with vapor wells, please shut the vapor wells off at least two days prior to any groundwater sampling and gauging.
11. You are required to submit information to show the depth to the drinking water aquifer, and a scaled map showing the locations of the production wells, and surface water bodies within a one-mile radius of the site. The production well information must include the following: the well owner, the well identification number, well construction detail, and the status of the well. In addition, you are required to discuss the local geologic formations and lithology, which will allow this Regional Board to assess the vulnerability of the nearby drinking water supply wells, and determine any potential contaminant migration pathways to deeper groundwater zones. Please include this information along with your upcoming report.
12. The Regional Board shall be notified at least 5 working days prior to the monitoring well installation activities and groundwater sampling. Regional Board staff may observe field activities and/or take duplicate samples as needed.

Please submit a report summarizing well installation activities and groundwater data by **July 1, 2002** for our review. If you have any questions, please contact me at (213) 576-6724.

Sincerely,



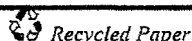
Jeffrey Sharp, R.G., C.E.G.  
Associate Engineering Geologist  
Site Cleanup I Unit

cc: Mr. Bob Schneider, Trilogy Regulatory Services  
Mr. Michael Tye, EST

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\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



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CAL/EPA Secretary

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### CHEMICAL STORAGE AND USE QUESTIONNAIRE

#### VOLATILE ORGANIC COMPOUNDS (VOC) INVESTIGATION

#### I. Facility information

Revised (11/4/08)

1. Company name: \_\_\_\_\_
2. Company address: \_\_\_\_\_ Unit No. \_\_\_\_\_
3. City: \_\_\_\_\_ Zip code: \_\_\_\_\_ Phone: ( ) \_\_\_\_\_
4. Standard Industrial Classification (SIC): \_\_\_\_\_
5. Brief description of business:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. EPA Generator Number: \_\_\_\_\_ Years in business at this location: \_\_\_\_\_

7. Answer the following questions relative to **PRESENT** operations:

- A. Do you use any of the following: solvents, coatings, liquid polymers, extractive agents, paint and/or varnish removers, cleaning and degreasing agents, or agricultural soil fumigant compounds? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_

Please submit any MSDS or product related information regarding the above referenced compounds.

- B. Do you have storage tanks? \_\_\_\_\_ Yes \_\_\_\_\_ No
- C. Do you have degreasers? \_\_\_\_\_ Yes \_\_\_\_\_ No
- D. Do you perform metal work? \_\_\_\_\_ Yes \_\_\_\_\_ No
- E. Do you have a clarifier, sump, tank or other holding tanks for waste water/waste chemicals/waste oil? \_\_\_\_\_ Yes \_\_\_\_\_ No
- F. Do you have an industrial waste permit for sewer discharge? \_\_\_\_\_ Yes \_\_\_\_\_ No
- G. Do you store chemicals at this location? \_\_\_\_\_ Yes \_\_\_\_\_ No

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H. Have any soil, waste water and/or groundwater investigations been conducted on the property? ☐ Yes ☐ No  
If so, under what state or local agency? \_\_\_\_\_

8. Answer the following questions relative to **PAST** operations:

A. Have you used any of the following: solvents, coatings, liquid polymers, extractive agents, paint and/or varnish removers, cleaning and degreasing agents, or agricultural soil fumigant compounds? ☐ Yes ☐ No  
If yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_

Please submit any MSDS or product related information regarding the above referenced compounds.

B. Did you once have storage tanks? ☐ Yes ☐ No  
C. Did you once have degreasers? ☐ Yes ☐ No  
D. Did you perform metal work? ☐ Yes ☐ No  
E. Did you have a clarifier, sump, tank or other holding tanks for waste water/waste chemicals/waste oil? ☐ Yes ☐ No  
F. Did you have an industrial waste permit for sewer discharge? ☐ Yes ☐ No  
G. Did you have a drum storage area? ☐ Yes ☐ No  
H. Have any soil, waste water and/or groundwater investigations been conducted on the property? ☐ Yes ☐ No

9. Name(s) of former tenants(s), dates of operation and type(s) of business(es) (use the back of this page for additional tenants or provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site

10. List all processes in which chemicals are (were) used.

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**II. Property owner information**

1. Name of current property owner: \_\_\_\_\_

2. Mailing address of property owner: \_\_\_\_\_

3. City: \_\_\_\_\_ Zip code: \_\_\_\_\_ Phone: ( ) \_\_\_\_\_

4. Prior property owner(s) and the dates of their ownership

Property Owner	Dates of Ownership	
	From	To

**III. Waste Management**

1. What are the sources of industrial waste at the site? (Identify each source by process, composition of waste generated and approximate quantity disposed of monthly).

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**IV. Sewer Information**

1. ☐ Industrial ☐ Septic tank ☐ Municipal ☐ Cesspool

2. Was a different sewer system used in the past? ☐ Yes ☐ No

If yes, specify type \_\_\_\_\_

**V. Chemical Storage and Use**

Complete the following sections for all chemicals in current use or that have been used in the past. Add additional sheets if needed to complete your listing.

1. Chemical name: \_\_\_\_\_
  2. Common/Trade name: \_\_\_\_\_ Quantity stored: \_\_\_\_\_
  3. Storage method:        ☐ Underground tank        ☐ Drums  
                                 ☐ Above ground tank        ☐ Other (specify) \_\_\_\_\_
  4. Waste disposal:        ☐ Sewered        ☐ Onsite recycling  
                                 ☐ Hauled        ☐ Offsite recycling \_\_\_\_\_
  5. Is the waste treated prior to disposal?        ☐ Yes    ☐ No  
    If yes, specify treatment method: \_\_\_\_\_
  6. Is the waste stored prior to disposal?        ☐ Yes    ☐ No
  7. Is manifest documentation for designated waste  
    streams available?        ☐ Yes    ☐ No
- 

1. Chemical name: \_\_\_\_\_
2. Common/Trade name: \_\_\_\_\_ Quantity stored: \_\_\_\_\_
3. Storage method:        ☐ Underground tank        ☐ Drums  
                                 ☐ Above ground tank        ☐ Other (specify) \_\_\_\_\_
4. Waste disposal:        ☐ Sewered        ☐ Onsite recycling  
                                 ☐ Hauled        ☐ Offsite recycling \_\_\_\_\_
5. Is the waste treated prior to disposal?        ☐ Yes    ☐ No  
    If yes, specify treatment method: \_\_\_\_\_
6. Is the waste stored prior to disposal?        ☐ Yes    ☐ No
7. Is manifest documentation for designated waste  
    streams available?        ☐ Yes    ☐ No

This questionnaire shall be signed below by a principal executive officer at the level of vice-president or his duly authorized representative if such representative is responsible for the overall operation of the facility in the case of corporations; by a general partner in the case of a partnership; by the proprietor in the case of a sole proprietorship; or by either a principal executive officer, ranking elected official, or other duly authorized employee in the case of a municipal, State, or other public facility.

This questionnaire has been completed under penalty of perjury and, to the best of my knowledge, is true and correct.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed name: \_\_\_\_\_ Title: \_\_\_\_\_

Phone number: (    ) \_\_\_\_\_

Contact name: \_\_\_\_\_ Title: \_\_\_\_\_

Phone number: (    ) \_\_\_\_\_